

REMARKS

Claims 1-59 were filed with the application. Following a first office action, mailed on August 24, 2004, the applicant filed an amendment on February 24, 2005. In the February 24 amendment, claims 40, 41, and 56-59 were cancelled, and claims 60-66 were added. Additionally, claims 38, 51, and 55 were amended. Claims 1-39, 42-55, and 60-66 are currently pending. In this Reply, claims 1, 3, and 64 are amended. Reconsideration and allowance of claims 1-39, 42-55, and 60-66 is respectfully requested in view of the above amendments and the following remarks.

The Information Disclosure Statements:

The Applicant respectfully requests that the examiner consider the Information Disclosure Statements filed on August 19, 2005.

I. Specification:

The Examiner stated that the title of the invention is not descriptive. The title of the invention has been amended to "Wellhead with Radially Expanded Tubulars."

II. Amendments to the Claims

Independent claims 1, 3, and 64 are amended in this response. The claims are amended to include the limitation that the plurality of inner casings (or tubular members) are coupled to the interior surface of the outer casing (or tubular member) "by contact pressure between an outer surface of each of the plurality of inner casings [or tubular members] and an interior surface of the outer casing [or tubular member]."

Support for this limitation may be found in the specification in paragraph 15, which states that, "Each inner casing is supported by contact pressure between an outer surface of the inner casing and an inner surface of the outer casing." Additional support for this limitation may be found paragraphs 18, 52, 89, 214, 259, 260, 300, 313, 314, 318, 320-323, 333, and 336. No new matter is added.

III. Claim Rejections Under § 102

A. Rejections Based on Wester '579

Claims 1, 3, 8, 9, 54, 55, 64, and 66 were rejected under 35 U.S.C. § 102(b) as being anticipated U.S. Patent No. 4,836,579 to Wester, *et al.* ("Wester '579"). The Examiner indicated that Wester '579 discloses inner casings (14 and 16 in FIG. 1) that are indirectly coupled to the interior surface of the outer casing (18 in FIG. 1).

Claims 1, 3, and 64 are amended. To the extent this rejection still applies, the rejection is respectfully traversed because Wester '579 does not disclose all of the limitations in the claims. As amended, independent claims 1, 3, and 64 now recite that the plurality of inner casings (or tubular members) are coupled to the interior surface of the outer casing (or tubular member) "by contact pressure between an outer surface of each of the plurality of inner casings [or tubular members] and the interior surface of the outer casing [or tubular member]."

This limitation is not disclosed in Wester '579. As stated by the Examiner, Wester '579 discloses that the inner casings (14, 16) are indirectly coupled to the outer casing (18) by hangar assemblies (10, 12). Wester '579 does not disclose any contact pressure between the outer surface of each of the plurality of inner casings and the interior surface of the outer casing, as recited in the claims.

With respect to claim 66, this rejection is respectfully traversed because Wester '579 does not disclose all of the limitations in the claims. Claim 66 recites that the inner tubular members are expanded "into contact with at least a portion of the interior surface of the outer tubular member." With respect to Wester '579, the Examiner stated that inner casings are "indirectly coupled to interior surface of the outer casing." This does not meet the limitation that the inner tubular members are expanded into contact with the outer tubular member.

Thus, because Wester '579 does not disclose all of the limitations in the claims, claims 1, 3, 64, and 66 are allowable over Wester '579. Dependent claims 4–9 and 50–55 are

allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

B. Rejections Based on Jennings '063

Claims 1, 3, 8, 9, 54, 55, 60–64, and 66 were rejected under 35 U.S.C. § 102(b) as being anticipated U.S. Patent No. 4,595,063 to Jennings, *et al.* (“Jennings '063”). The Examiner indicated that Jennings '063 discloses inner casings (26 and 28 in FIG. 1) that are indirectly coupled to the interior surface of the outer casing (38 in FIG. 1).

Claims 1, 3, and 64 are amended. To the extent this rejection still applies, the rejection is respectfully traversed because Jennings '063 does not disclose all of the limitations in the claims. As amended, independent claims 1, 3, and 64 now recite that the plurality of inner casings (or tubular members) are coupled to the interior surface of the outer casing (or tubular member) “by contact pressure between an outer surface of each of the plurality of inner casings [or tubular members] and the interior surface of the outer casing [or tubular member].”

This limitation is not disclosed in Jennings '063. As stated by the Examiner, Jennings '063 discloses that the inner casings (26, 28) are indirectly coupled to the outer casing (38) by hangar assemblies (20, 22). Jennings '063 does not disclose any contact pressure between the outer surface of each of the plurality of inner casings and the interior surface of the outer casing, as recited in the claims.

With respect to claim 60, this rejection is respectfully traversed because Jennings '063 does not disclose all of the limitations in the claims. Claim 60 recites that each inner casing includes “a first tubular portion supported by contact pressure between an outer surface of the first tubular portion and the interior surface of the outer casing.” As discussed above, Jennings '063 does not disclose any contact pressure between an outer surface of the first tubular portion and the interior surface of the outer casing.

With respect to claim 66, this rejection is respectfully traversed because Jennings '063 does not disclose all of the limitations in the claims. Claim 66 recites that the inner tubular members are expanded “into contact with at least a portion of the interior

surface of the outer tubular member.” With respect to Jennings '063, the Examiner stated that inner casings are “indirectly coupled to interior surface of the outer casing.” This does not meet the limitation that the inner tubular members are expanded into contact with the outer tubular member.

Thus, because Jennings '063 does not disclose all of the limitations in the claims, independent claims 1, 3, 60, 64, and 66 are allowable over Jennings '063. Dependent claims 4–9, 50–55, and 61–63 are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

C. Rejections Based on Lawson '782

Claims 1, 3, 8, 9, 54, 55, 60–64, and 66 were rejected under 35 U.S.C. § 102(b) as being anticipated U.S. Patent No. 4,550,782 to Lawson (“Lawson '782”). The Examiner indicated that Lawson '782 discloses a plurality of inner casings (32, 34, 36 in FIG. 1) that are indirectly coupled to the interior surface of an outer casing (16/14 in FIG. 1).

Claims 1, 3, and 64 are amended. To the extent this rejection still applies, the rejection is respectfully traversed because Lawson '782 does not disclose all of the limitations in the claims. As amended, independent claims 1, 3, and 64 now recite that the plurality of inner casings (or tubular members) are coupled to the interior surface if the outer casing (or tubular member) “by contact pressure between an outer surface of each of the plurality of inner casings [or tubular members] and the interior surface of the outer casing [or tubular member].”

This limitation is not disclosed in Lawson '782. As stated by the Examiner, Lawson '782 discloses that the inner casings (32, 34, 36) are indirectly coupled to the outer casing (16/14) by hangar assemblies (18, 20, 22). Lawson '782 does not disclose any contact pressure between the outer surface of each of the plurality of inner casings and the interior surface of the outer casing, as recited in the claims.

With respect to claim 60, this rejection is respectfully traversed because Lawson '782 does not disclose all of the limitations in the claims. Claim 60 recites that each inner casing includes “a first tubular portion supported by contact pressure between an outer

surface of the first tubular portion and the interior surface of the outer casing.” As discussed above, Lawson '782 does not disclose any contact pressure between an outer surface of the first tubular portion and the interior surface of the outer casing.

With respect to claim 66, this rejection is respectfully traversed because Lawson '782 does not disclose all of the limitations in the claims. Claim 66 recites that the inner tubular members are expanded “into contact with at least a portion of the interior surface of the outer tubular member.” With respect to Lawson '782, the Examiner stated that inner casings are “indirectly coupled to interior surface of the outer casing.” This does not meet the limitation that the inner tubular members are expanded into contact with the outer tubular member.

Thus, because Lawson '782 does not disclose all of the limitations in the claims, independent claims 1, 3, 60, 64, and 66 are allowable over Lawson '782. Dependent claims 4–9, 50–55, and 61–63 are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

IV. Rejections Under § 103

Claims 4–7 and 50–53 were rejected under 35 U.S.C. § 103(a) as being obvious over combinations of Wester '579, Jennings '063, or Lawson '782, as applied to claims 1 and 3, in view of U.S. Patent No. 6,354,373 to Vercaemer, et al. (“Vercarmer '373”). The Examiner indicated that Vercaemer '373 teaches an inner casing (29 in FIG. 5) that is extruded off a mandrel (36 in FIG. 5) to expand the casing.

As discussed above, independent claims 1 and 3, as amended, are allowable over Wester '579, Jennings '063, and Lawson '782 because none of the cited references show contact pressure between an outer surface of each of the plurality of inner casings (or tubular members) and an interior surface of the outer casing (or tubular member). Vercarmer '373 does not make up for these deficiencies. Vercarmer '373 does not show contact pressure between an outer surface of each of the plurality of inner casings (or tubular members) and an interior surface of the outer casing (or tubular member). Thus, independent claims 1 and 3 are allowable over the combination of Wester '579,

S/N 10/624,842

Jennings '063, or Lawson '782 with Vercarmer '373. Dependent claims 4-7 and 50-53 are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

V. Conclusion

In view of the foregoing amendments and remarks, it is respectfully submitted that the pending claims are drawn to novel subject matter, patentably distinguishable over the prior art of record. The Examiner is therefore respectfully requested to reconsider and allow claims presented for reconsideration herein. To the extent that the present amendment results in additional fees, the Applicant authorizes the Commissioner to charge deposit account no. 08-1394.

Should the Examiner deem that any further amendment is desirable to place this application in condition for allowance, the Examiner is invited to telephone the undersigned at the below listed telephone number.

Respectfully submitted,



Todd Mattingly

Registration No. 40,298

Dated: 10/20/05
HAYNES AND BOONE, L.L.P.
901 Main Street, Suite 3100
Dallas, Texas 75202-3789
Telephone: 713/547-2301
Facsimile: 214/200-0853
File: 25791.151

H-575670_1.DOC

Certificate of Mailing	
I hereby certify that this correspondence is being deposited with the United States Postal Service as Express Mail in an envelope addressed to Commissioner For Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on <u>October 20, 2005</u>	
<u>Stacy Lanier</u>	
Printed Name	
<u>Stacy Lanier</u>	
Signature	
<u>4V 703488860US</u>	
Express Mail Label Number	